Remarks

I. Administrative Overview

Claims 1-33 were presented for examination. Applicant respectfully requests reconsideration and withdrawal of the objections to the claims as previously presented.

II. Rejections under 35 U.S.C. § 103

Claims 1-33 are rejected under 35 U.S.C. § 103(a) as unpatentable over publication, IBM Technical Disclosure Bulletin titled "Administrative Role Configuration with Control Lists" TDB-ACC-NO: NB9112110 ("**IBM**") in view of U.S. Publication Number 2003/0046584 A1 to Laksono ("Laksono"). Applicant respectfully submits that Claims 1-33 as previously presented are patentable over **IBM** in view of Laksono.

A claimed invention is obvious when two or more references, alone or in combination, teach or suggest each and every limitation of the claimed invention. Applicant respectfully submits that any combination of **IBM** and Laksono fails to teach or suggest each and every limitation of the claimed invention.

There is no motivation to combine **IBM** with Laksono because any combination of **IBM** with Laksono would render **IBM** unsuitable for its intended function. **IBM** describes a system for defining administrative roles in a UNIX system that allows any user to execute a particular command, but provides some users with specific privileges when executing that particular command. *See* **IBM**, p. 4. The system described by **IBM** accomplishes this by associating privileges "directly with the program file" so that "any method of executing the command will work." *See* **IBM** p.4. In contrast, Laksono describes preventing users from controlling a media device in the absence of authentication of a hand held device using "the identity of the hand held device and/or its password." *See* Laksono, p. 4 paragraph 40. Combining **IBM** with Laksono would create a system where commands can only be executed by authenticated users. Thus, any combination of **IBM** with Laksono would fail to produce a system that allows any user to execute a particular command. For this reason, there is no motivation to combine **IBM** with Laksono.

Further, as noted by the Applicant in the response filed March 4, 2007, **IBM** fails to teach or suggest determining a minimal set of privileges necessary for the user to use the application as

required by independent Claims 1, 15, 26 and 29.[1] Laksono also fails to teach or suggest determining a minimal set of privileges necessary for the user to use the application as required by independent Claims 1, 15, 26 and 29. Instead, Laksono describes using the identity of the hand held device to authenticate a hand held device. *See* p. 4, paragraph 40. Authenticating a device is not the same as determining a minimal set of privileges necessary for a user to use an application. Thus, neither **IBM** or Laksono teaches each and every limitation of Claims 1, 15, 26 and 29.

In light of the above remarks, Claims 1, 15, 26 and 29 are patentable over any combination of **IBM** and Laksono. Claims 2-14, 16-25, 27-28 and 30-33 are dependent on Claims 1, 15, 26 and 29, therefore, Claims 2-14, 16-25, 27-28 and 30-33 are also patentable over any combination of **IBM** and Laksono. For these reasons, Applicant respectfully requests that the Examiner withdraw all rejections made under 35 U.S.C. § 103.

III. Conclusion

Applicant contends that the Examiner's rejections are adequately addressed by the above-made remarks, and that all of the pending claims are in a condition for allowance. Accordingly, Applicant respectfully requests reconsideration and withdrawal of all rejections and objections, and allowance of the pending claims.

Should the Examiner feel that a telephone conference with Applicant's agent would expedite prosecution of this application; the Examiner is urged to contact Applicant's agent at the particulars identified below.

---

[1] The "Least Privilege Principle" described in **IBM** refers to a principle known by those of skill in the art that states that a user, program, process or other machine should be given access to only as much information as necessary for that user, program, process or other machine to accomplish a particular task or operate according to its particular purpose. The reference to the "Least Privilege Principle" does not refer to a specific mechanism described in **IBM**, rather it is a reference to a principle in the art that was used to guide the development of the system described on pages 3 and 4.

Respectfully submitted,
CHOATE, HALL & STEWART LLP

Date: November 6, 2008

/Kellan D. Ponikiewicz/
Kellan D. Ponikiewicz
Registration Number: 59,701

Patent Group
CHOATE, HALL & STEWART LLP
Two International Place
Boston, MA 02110
Phone: (617) 248-5000
Fax: (617) 502-5002